

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
HUNTINGTON

UNITED STATES OF AMERICA

v.

CRIMINAL NO.

3:20-cr-00012
18 U.S.C. § 1341

ROBERT DALE ADKINS

I N F O R M A T I O N
(Mail Fraud)



The United States Attorney Charges:

Background

1. At all relevant times, defendant ROBERT DALE ADKINS was the treasurer for the Antioch Baptist Church, located at or near Ona, Cabell County, West Virginia. As treasurer, ADKINS was not entitled to a salary or payment for his services to the church and had access to the church's bank statements and checkbook.

2. Antioch Baptist Church maintained a checking account at City National Bank. ROBERT DALE ADKINS was the authorized signatory on that account. ADKINS wrote checks out of the church's bank account and made the deposits into the church's bank account without approval or oversight from other church board members.

The Scheme

3. From at least 2012 until approximately December of 2018, at or near Ona, Cabell County, West Virginia, and within the Southern District of West Virginia and elsewhere, defendant ROBERT

DALE ADKINS did knowingly devise and intend to devise a scheme and artifice to defraud and to obtain money and property, by means of materially false and fraudulent pretenses, representations and promises.

Manner and Means of the Scheme

4. It was part of the scheme to defraud that ROBERT DALE ADKINS wrote checks from the City National Bank checking account of Antioch Baptist Church to himself for personal benefit and the benefit of others without the knowledge and authority of the Antioch Baptist Church.

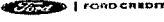
5. It was a further part of the scheme that ROBERT DALE ADKINS wrote checks to his personal creditors from the checking account of Antioch Baptist Church without the knowledge and authority of Antioch Baptist Church.


6. As a result of his scheme to defraud, defendant ROBERT DALE ADKINS embezzled approximately \$487,488.92 from Antioch Baptist Church, for his personal benefit and the benefit of others, during the relevant timeframe.

Use of the Mail

7. On or about December 18, 2018, at or near Ona, Cabell County, West Virginia, and within the Southern District of West Virginia, for the purpose of executing or attempting to execute the above-described scheme and artifice to defraud, ROBERT DALE ADKINS knowingly placed in an authorized depository for mail, to

be sent and delivered by the United States Postal Service according to the direction thereon, an envelope addressed to Ford Credit containing the matters and things described below: that is, ROBERT DALE ADKINS mailed and caused to be delivered by mail to Ford Credit at P.O. Box 650575 in Dallas, TX 75265-0575, check number 31027 drawn on Antioch Baptist Church's City National Bank checking account in the amount of Five Hundred Thirty-Four Dollars and 98/100 (\$534.98), which he wrote and signed as shown below:

| | | | | |
|---|--|--|--|--|
|  FORD CREDIT Customer Service Center P.O. Box 640000 Omaha NE 68164-0000 | | ACCOUNT Number Payment Due Date TOTAL AMOUNT DUE If Payment Received AFTER Please Pay | | 12/16/2018 \$ 509.50 12/26/2018 \$ 534.98 |
| 0013457 01 AB 0405 **AUTO T4 2 1234 21545 958131 -001 P13470-11 ROBERT D ADKINS ONA WV 25545-9583 | | ENTER TOTAL AMOUNT PAID ABOVE SEND PAYMENT TO: Antioch Baptist Church P.O. Box 650575 Dallas TX 75265-0575 | | |
| 1460630000000000005325699300050950007 | | | | |

| | | |
|--|----------------------|---|
| ANTIOCH BAPTIST CHURCH ONA, WV 25545 | | 31027 |
| DATE <u>12-18-18</u> | | 69-452/519 |
| PAY TO THE ORDER OF <u>FC</u> | \$ <u>534.98</u> | DOLLARS |
| <u>Five Hundred Thirty Four - 98/100</u> | DOLLARS | ANTIOCH BAPTIST CHURCH |
| City <u>City</u> | FOR <u>RO Adkins</u> |  |
| #031027# | 2501000683# | |

8. ROBERT DALE ADKINS knew the amount of the check was not a legitimate expense of Antioch Baptist Church, but in fact, knew the check was for a payment on a loan account for his personal vehicle, a 2016 Ford Escape.

In violation of Title 18, United States Code, Section 1341.

NOTICE OF FORFEITURE

1. The allegations contained in this information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 982(a)(2), and 28 U.S.C. § 2461(c).

2. Upon conviction of the offense in violation of Title 18, United States Code, Section 1341 set forth in this information, the defendant, ROBERT DALE ADKINS shall forfeit to the United States of America, pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 982(a)(2), and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense(s). The property to be forfeited includes, but is not limited to, \$487,488.92 for which the United States will seek a money judgment.

MICHAEL B. STUART
United States Attorney

By:



R. GREGORY McVEY
Assistant United States Attorney